



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

August 31, 2018

Via ECF

The Honorable Andrew L. Carter, Jr.
United States District Judge
Southern District of New York
United State Courthouse
40 Foley Square, Courtroom 1306
New York, New York 10007

Re: *United States v. Ali Sadr Hashemi Nejad*, 18 Cr. 224 (ALC)

Dear Judge Carter:

The Government respectfully writes in response to the defendant's August 27, 2018 letter. Though we disagree with several of the defendant's assertions in that letter, we nevertheless, in an abundance of caution, consent to the proposed three-week hiatus to allow the defense to complete its review of potentially privileged materials. Specifically, the Government agrees that the prosecution team will refrain from reviewing or disseminating any discovery materials in this case for three weeks from today. However, the Court should allow the Government's taint team (which is principally comprised of lawyers and paralegals at the New York County District Attorney's Office) and information-technology staff continued access to all discovery materials so that they can further analyze the assertions in the defendant's letter and take any appropriate actions to address them. The Government proposes that the parties update the Court by letter on September 21, 2018, at which time the Government will be in a better position to respond to the allegations in the defendant's August 27 letter.

CC: Defense Counsel (via ECF)